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Counsel for Defendant
Jizhong Chen

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES,

Plaintiff,

vs.

JIZHONG CHEN,

Defendant.

Case No.: CR 19-00056 EJD

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE STATUS CONFERENCE**

IT IS HEREBY STIPULATED AND AGREED between the Government, through Assistant United States Attorney Marissa Harris, and Defendant Jizhong Chen, through his attorney Daniel Olmos, that the status hearing in this matter be continued from March 15, 2021, to May 17, 2021.

This is a complex case with voluminous discovery, including discovery productions from the Government in April, May, and October 2020. The government has informed defense counsel that it intends to produce additional discovery in the next week. Further, the stay-at-home orders governing California and the Bay Area counties, General Order 72-2, and other circumstances driven by the COVID-19 global health crisis have prevented defense counsel for the past ten months from meeting in person with his client or with potential witnesses and experts. The stay-at-home orders have also prevented defense counsel from conducting any meaningful defense investigation.

1 The parties agree that the time between March 15, 2021, and May 17, 2021, should be
2 excluded from calculations under the Speedy Trial Act, which excludes delay when the interests of
3 justice in allowing for the effective preparation of the defense outweigh the best interest of the public
4 and the defendant in a speedy trial, taking into account the exercise of due diligence. 18 U.S.C. §§
5 3161(h)(7)(A) and (B)(iv).
6

7 For the foregoing reasons, the parties stipulate to continue the status conference to May 17,
8 2021.

9 IT IS SO STIPULATED

10 Dated: March 9, 2021

NOLAN BARTON & OLMOS LLP

11
12 /S/ Daniel B. Olmos

Daniel B. Olmos

13 Attorney for Defendant Jizhong Chen
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15
16 Dated: March 9, 2021

Stephanie Hinds, Acting United States Attorney

17 /S/ Marissa Harris

18 By: Marissa Harris

19 Assistant United States Attorney
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3 UNITED STATES DISTRICT COURT
4 FOR THE NORTHERN DISTRICT OF CALIFORNIA
5 SAN JOSE DIVISION
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8 UNITED STATES,

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Case No.: CR 19-00056 EJD

~~[PROPOSED]~~ ORDER TO CONTINUE
STATUS CONFERENCE

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16 GOOD CAUSE APPEARING, it is hereby ordered that the status conference currently
17 scheduled for March 15, 2021, be continued to May 17, 2021, at 1:30 p.m. Based upon the
18 representation of counsel and for good cause shown, the Court also finds that the time between March
19 15, 2021, and May 17, 2021, shall be excluded from calculations under the Speedy Trial Act. The
20 interests of justice in allowing for the effective preparation of the defense and continuity of counsel
21 outweigh the best interest of the public and the defendant in a speedy trial, taking into account the
22 exercise of due diligence. 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).
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24 Dated: 3/9/2021



25 The Hon. Edward J. Davila
26 United States District Judge
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